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March 7, 2022

Via ECF

Ruby J. Krajick,
Clerk of Court,
United States District Court,
Southern District of New York,
400 Pearl Street,
New York, New York 10007.

Re: *In re SSA Bonds Antitrust Litigation*, No. 1:16-cv-3711 (ER)

Dear Clerk Krajick,

I write on behalf of Defendants¹ in the above-referenced case. Defendants are in receipt of your letter, dated January 20, 2022, informing the parties of a “potential conflict” arising out of Judge Ramos’s “ownership of stock” in two Defendants that “neither affected nor impacted his decisions in this case.” (ECF No. 693.)

Defendants are also in receipt of Plaintiffs’ response, filed six weeks later, on March 3, 2022, in which Plaintiffs request that, as a result of this “potential conflict,” the Clerk of Court assign this case to a “new judge” who, Plaintiffs argue, should “void the judgments against the non-settling Defendants.” (ECF No. 694.)

Plaintiffs’ request to reassign the case and “void” Judge Ramos’s judgments is meritless, particularly in light of the Second Circuit’s order (ECF No. 692) affirming those judgments following *de novo* review. *See, e.g., Marcus v. Smith*, 755 F. App’x 47, 52 (2d Cir.

¹ “Defendants” are dealer defendants Barclays Bank PLC, Barclays Capital Inc., Barclays Services Limited, Barclays Capital Securities Limited, BNP Paribas, BNP Paribas Securities Corp., Citigroup Inc., Citibank, N.A., Citigroup Global Markets Inc., Citigroup Global Markets Limited, Credit Suisse AG, Credit Suisse Securities (USA) LLC, Credit Suisse Securities (Europe) Ltd., Credit Suisse International, Crédit Agricole Corporate and Investment Bank, Nomura International plc, Nomura Securities International, Inc., Royal Bank of Canada, RBC Europe Limited, RBC Capital Markets, LLC, The Toronto-Dominion Bank, and TD Securities (USA) LLC, and individual defendants Bhardeep Heer, Gary McDonald and Shailen Pau.

2018) (“[O]ur *de novo* review of the viability of the Second Amended Complaint alleviates any risk that the public’s confidence in the judicial process will be undermined by the alleged conflict.”). Nonetheless, if the Clerk of Court deems it necessary to reassign this case to a new judge, Defendants will respond appropriately in due course.

Respectfully submitted,

/s/ Matthew J. Porpora

Cc: Counsel of Record (via ECF)